

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DICKINSON BAY AREA BRANCH	§	
NAACP, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-117- JVB
	§	
GALVESTON COUNTY, TEXAS, et al.,	§	
	§	
<i>Defendants.</i>	§	

TERRY PETTEWAY, et al.,	§	
	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-57-JVB
	§	[Lead Consolidated Case]
	§	
GALVESTON COUNTY, TEXAS, et al.,	§	
	§	
<i>Defendants.</i>	§	

UNITED STATES OF AMERICA,	§	
	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-93-JVB
	§	
	§	
GALVESTON COUNTY, TEXAS, et al.,	§	
	§	
<i>Defendants.</i>	§	

**NAACP PLAINTIFFS' NOTICE OF FILING
DECLARATIONS IN SUPPORT OF FIRST AMENDMENT PRIVILEGE**

As directed by the Court in its May 8, 2023 Order, Doc. 165, NAACP Plaintiffs hereby provide notice to the Court of the filing of the following Declarations in support of NAACP Plaintiffs' assertions of First Amendment privilege (*see* Doc. 148):

1. May 9, 2023 Declaration of Mary Patrick;
2. May 9, 2023 Declaration of Lucretia Lofton.

Respectfully submitted this 9th day of May, 2023.

/s/ Hilary Harris Klein

**SOUTHERN COALITION FOR
SOCIAL JUSTICE**

Hilary Harris Klein*
North Carolina Bar No. 53711
Adrianne M. Spoto*
DC Bar No. 1736462
1415 W. Hwy 54, Suite 101
Durham, NC 27707
919-323-3380 (Telephone)
919-323-3942 (Facsimile)
hilaryhklein@scsj.org
adrianne@scsj.org

TEXAS CIVIL RIGHTS PROJECT

Attorney-in-Charge
Hani Mirza
Texas Bar No. 24083512
Joaquin Gonzalez*
Texas Bar No. 24109935
Sarah Xiyi Chen*
California Bar No. 325327
1405 Montopolis Drive
Austin, TX 78741
512-474-5073 (Telephone)
512-474-0726 (Facsimile)
hani@texascivilrightsproject.org
joaquin@texascivilrightsproject.org
schen@texascivilrightsproject.org

**WILLKIE FARR & GALLAGHER
LLP**

Richard Mancino*
New York Bar No. 1852797
Andrew J. Silberstein*
New York Bar No. 5877998
Molly Linda Zhu*
New York Bar No. 5909353
Kathryn Carr Garrett*
New York Bar No. 5923909
787 Seventh Avenue
New York, New York 10019
212-728-8000 (Telephone)
212-728-8111 (Facsimile)
rmancino@willkie.com
asilberstein@willkie.com
mzhu@willkie.com
kgarrett@willkie.com

Diana C. Vall-llobera*
DC Bar No. 1672102
1875 K Street, N.W.
Washington, DC 20006-1238
(202) 303-1000 (Telephone)
(202) 303-2000 (Facsimile)
dvall-llobera@willkie.com

SPENCER & ASSOCIATES, PLLC

Nickolas Spencer
Texas Bar No. 24102529
9100 Southwest Freeway, Suite 122
Houston, TX 77074
713-863-1409 (Telephone)
nas@naslegal.com

COUNSEL FOR NAACP PLAINTIFFS

**admitted pro hac vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 9, 2023, the foregoing document and its Exhibits were filed electronically (via CM/ECF), and that all counsel of record were served by CM/ECF.

/s/ Hilary Harris Klein